

DAVIS WRIGHT TREMAINE LLP

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*Attorneys for Defendant
The GEO Group, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

-----X	
STATE OF NEW JERSEY,	:
	:
Plaintiff,	:
	:
- against -	:
	:
THE GEO GROUP, INC.,	:
	:
	:
Defendant.	:
	:
-----X	

No. 2:25-cv-12007-JKS-LDW

**NOTICE OF MOTION FOR
ADMISSION OF JOSEPH
NEGRON, JR. *PRO HAC VICE***

Motion Day: August 18, 2025

PLEASE TAKE NOTICE that counsel for Defendant The GEO Group, Inc. (“GEO”) will move before this Court, at the United States District Court for the District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101 on August 18, 2025, or a date to be assigned by the Court, for an Order granting leave for Joseph Negron, Jr. to make a special appearance as its counsel *pro hac vice* in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that undersigned counsel for GEO sent a letter via overnight FedEx to the City of Newark Municipal Prosecutor's Office on June 30, 2025, in an attempt to obtain consent to this motion, but has not received any response as of the date of this filing.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, GEO shall rely upon the Declaration of Geoffrey S. Brounell and the Declaration of Joseph Negron, Jr., which are submitted herewith, but that no brief is submitted because this motion is addressed to the discretion of the Court pursuant to Local Rule 101.1(c).

PLEASE TAKE FURTHER NOTICE that a proposed form of order granting the requested relief is submitted herewith.

Dated: July 25, 2025

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Geoffrey S. Brounell

Geoffrey S. Brounell